

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEFFREY A. BENTLEY,

Defendant.

REDACTED

Criminal Action No. 05-39

**INDICTMENT**

The Grand Jury for the District of Delaware charges that:

**COUNT ONE**

On or about February 20, 2005, in or near Dover, in the State and District of Delaware, JEFFREY A. BENTLEY, defendant herein, did knowingly possess in and affecting interstate commerce, a firearm, that is, a Hi-Point pistol, model C, 9mm, serial number 036839, after having been convicted on or about March 8, 1991, of a crime punishable by imprisonment for a term exceeding one year, in the Superior Court of the State of Delaware in and for Kent County, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2), (e)(1).

**COUNT TWO**

On or about February 20, 2005, in or near Dover, in the State and District of Delaware, JEFFREY A. BENTLEY, defendant herein, did unlawfully attempt to obstruct, delay and affect commerce and the movement of articles and commodities in such commerce, by robbery, in that the defendant did unlawfully attempt to take and obtain personal property consisting of cash in the custody and possession of the victim, a person working at Dover Liquor Mart, 1255 South State

Street, Dover, Delaware, against his will by means of threatened force, violence, and fear of injury, immediate and future, to his person, in violation of Title 18, United States Code, Section 1951.

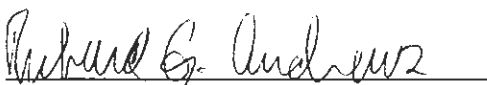
**COUNT THREE**

On or about February 20, 2005, in or near Dover, in the State and District of Delaware, JEFFREY A. BENTLEY, defendant herein, during and in relation to a crime of violence, that is, interference with commerce by robbery, in violation of Title 18, United States Code, Section 1951, as alleged in Count Two of the Indictment, incorporated herein by reference, did knowingly use and carry a firearm, that is, a Hi-Point pistol, model C, 9mm, serial number 036839, and in furtherance of that crime of violence, did knowingly possess that firearm, in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

A TRUE BILL:

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Foreperson

COLM F. CONNOLLY  
UNITED STATES ATTORNEY

  
BY: Anne Y. Park  
for Assistant United States Attorney

Dated: April 26, 2005